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In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
	:	
Helen Tomaskovic	:	Honorable Vincent F. Papalia
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Debtor,	:	Case No: 18-14652

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**OBJECTION TO TRUSTEE CERTIFICATION OF DEFAULT**

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I, Leonard R. Boyer, Esq., of Boyer Coffy, LLC., hereby certifies as follows:

On or about January 7, 2019, Marie-Ann Greenberg, Chapter 13 Standing Trustee, filed a Certification of Default for failure to file a loan modification.

Debtor did apply for a loan modification, however, she was denied for insufficient income, Debtor's children are willing to help her, one of her son's will be moving in to help with paying mortgage and income to hopefully get her approve for a loan modification once we re-file same.

Debtor has lived in this home for over 40 yrs, she was unaware of the amount owed on the property until her husband passed away, she was under the impression that the property was paid in full.

Debtor is over 80 yrs old, has retired, however, went back to work to be able to make payments on the property, as well trustee payment for arrears.

Debtor prays the Court will allow her to continue with case, will seek loan modification within the next week.

Debtor apologizes to Trustee and the Court for the delay in the process of the loan modification.

/s/ Leonard R. Boyer, Esq.  
LEONARD R. BOYER, ESQ.

Dated: January 11, 2019